

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ERIC SMITH, and)	
ALLAEDHIN QANDAH,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:18-cv-171
)	
ST. CHARLES COUNTY, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFFS' MEMORANDUM TO CLERK REQUESTING ALIAS SUMMONS
FOR DEFENDANT ZACHARY RIDGEWAY**

COME NOW Plaintiffs, by and through their counsel of record, and hereby request the Clerk of this Court issue an Alias Summons to be served on Defendant Zachary Ridgeway based on the foregoing:

1. Plaintiffs filed their Complaint on January 31, 2018 (ECF No. 1) and sent to counsel for Defendant St. Charles County (1) the Complaint; (2) a Notice of Lawsuit and Request to Waive Service of a Summons; (3) a Waiver of the Service of Summons form for Zachary Ridgeway; and (4) a self-addressed, stamped return envelope.
2. Counsel for City of St. Charles was unable to locate Defendant Ridgeway and thus was not able to accept or waive service on behalf of Defendant Ridgeway.
3. On March 15, 2018, Plaintiffs sent a second Notice of Lawsuit and Request to Waive Service of a Summons, along with the Complaint, two copies of the Waiver of Service of Summons, and a self-addressed stamped return envelope, to Defendant Ridgeway at his home address via U.S.P.S. Certified Mail and First Class Mail.
4. Defendant Ridgeway failed to respond to the March 15, 2018 Request to Waive

Service of a Summons. *See* Waiver of Service Returned Unexecuted, ECF No. 24.

5. Plaintiffs hereby respectfully request this Court issue an Alias Summons to be served upon Defendant Zachary Ridgeway and have filed herewith a copy of the proposed Summons as Exhibit 1 to this Memorandum.

Dated: May 14, 2018

Respectfully submitted,

ARCHCITY DEFENDERS, INC.

By: /s/ Nathaniel R. Carroll

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that notice of filing and a copy of the foregoing was delivered to all parties and counsel of record via this Court's electronic PACER/ECF system upon filing on this 14th day of May, 2018.

/s/ Nathaniel R. Carroll